

REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 1 through 30, 46 through 49, and 52 are pending, with Claims 1, 5, 10, 16, 20, 25, and 46 through 49 being independent. Claims 50 and 51 have been cancelled without prejudice. Claims 1 through 3, 5 through 18, 20, 23, 25, 26, and 46 through 49 have been amended.

Transmitted herewith are three (3) replacement sheets of formal drawings, comprising Figs. 11, 29, 34A, 34B, and 34C, to be substituted for the corresponding drawing sheets presently on file in the above-identified application. The replacement sheets make the following changes to the drawings: (a) Fig. 11, "S1111" for NOTIFY USER OF ERROR has been changed to --S1113--; (b) Fig. 29, "PRITNER" has been changed to --PRINTER--; and (c) Figs. 34A and 34C, "Medi" has been changed to --Media--. Favorable consideration is earnestly solicited.

Claims 50 and 51 were rejected under 35 U.S.C. § 112, 1st paragraph, for lack of written description. All rejections are respectfully traversed, and are submitted to have been mooted by the cancellation without prejudice of Claims 50 and 51.

Claims 11 through 15 were rejected under 35 U.S.C. § 112, 2nd paragraph, as being indefinite. All rejections are respectfully traversed, and are submitted to have been obviated by the amendment of the claims to recite "system," instead of --device--.

Claims 1 through 9, 16 through 24, 46, 47, and 49 through 52 were rejected under 35 U.S.C. § 103 over European Patent Document 0 975 145 A2 (Yamamoto, et al.) in view of

U.S. Patent No. 6,370,147 B1 (Beser), and Claims 10 through 15, 25 through 30, and 48 were rejected under 35 U.S.C. § 103 over Yamamoto, et al. in view of U.S. Patent No. 6,671,063 B1 (Lida). All rejections are respectfully traversed.

Claims 1, 5, 16, 20, 46, and 47 variously recite, inter alia, a generating unit that generates (Claims 1 and 5) or generating (Claims 16, 20, 46, and 47) transfer information describing a combination of a plurality of devices on the basis of device information corresponding to each of the plurality of devices, the device information indicating that the device actively starts data communication with an external device or that the device passively executes data communication with an external device in accordance with an instruction from the external device which can actively start data communication; meanwhile, Claim 49 recites, inter alia, a generating unit that generates transfer information describing a combination of a plurality of devices on the basis of the acquired first device information (indicating that the first device actively starts data transfer to an external device or that the first device passively executes data transfer to an external device in accordance with an instruction from the external device which can actively start data reception) and the acquired second device information (indicating that the second device actively starts data reception from an external device or that the second device passively executes data reception from an external device in accordance with an instruction from the external device which can actively start data transfer).

Claims 10, 25, and 48 variously recite, inter alia, a generating unit that generates (Claim 10) and generating (Claims 25 and 48) transfer information describing a combination of a plurality of devices on the basis of device information corresponding to each of the plurality of devices, the plurality of devices including a proxy device which converts a data format of image

data, a first device that can transmit image data of which the data format can be converted by the proxy device, and a second device that can process image data of which the data format is converted (Claim 10), or the plurality of devices including a proxy device which converts image data into a data format, a first device which can transmit image data which the proxy device can convert into the data format, and a second device which can process image data converted into the data format (Claims 25 and 48).

However, Applicant respectfully submits that none of Yamamoto, et al., Beser, and Iida discloses or suggests at least the above-discussed combinations of claimed features as recited, inter alia, in Claims 1, 5, 10, 16, 20, 25, 46, 47, 48, and 49 and that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to attempt to combine the documents as proposed so as arrive at such combinations of features. In more detail, the Official Action states at pages 5 and 10 respectively that Yamamoto, et al. fails to show (a) whether a device actively and/or passively executes data communication and (b) a proxy device which converts image data to a data format, and therefore relies upon Beser and Iida, respectively. Applicant respectfully notes that Beser discloses, e.g., that active network devices are defined as having a DHCP protocol stack for obtaining an IP address and passive network devices are defined as other network devices without a DHCP protocol stack (e.g., col. 26, line 63-col. 27, line 8), while Iida discloses, e.g., a network facsimile apparatus including a TIFF conversion section that provides a function of converting coded facsimile data and document file data into TIFF format (e.g., col. 4, lines 3-8). However, Applicant respectfully submits that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to attempt to modify


Yamamoto, et al., in view of Beser and Iida, so as to arrive at the above-discussed claimed features as recited, inter alia, in Claims 1, 5, 10, 16, 20, 25, 46, 47, 48, and 49.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

Applicant submits that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,



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